

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 20-13580**  
**Ardena Y Starks** : **Chapter 13**  
**Debtor(s)** : **Judge Eric L. Frank**  
: **\*\*\*\*\***

**OBJECTION OF PNC BANK, NATIONAL ASSOCIATION TO CONFIRMATION  
OF THE AMENDED PLAN (DOCKET NUMBER 20)**

PNC Bank, National Association ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Amended Chapter 13 Plan ("Plan") filed by Ardena Y Starks ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 7300 W Passyunk Ave., Philadelphia, PA 19142 ("Property").
2. Creditor has filed Proof of Claim number 14 in the amount of \$6,038.79.
3. The claim was filed as a total debt claim as the underlying loan will mature in April 2024, during the Debtor's bankruptcy case.
4. Debtor's Plan proposes to pay the claim amount as arrears, and treats Creditor's secured claim as long term debt that will survive discharge.
5. Pursuant to 11 U.S.C. §1322(c)(2), Debtor's Plan should provide for payment in full of Creditor's claim at the contract interest rate. Failure to do so will result in immediate default upon completion of the Plan.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Amended Plan.

Respectfully submitted,

/s/ Karina Velter  
Karina Velter, Esquire (94781)

Adam B. Hall (323867)  
Sarah E. Barngrover (323972)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028  
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Attorneys for Creditor  
The case attorney for this file is Karina  
Velter.  
Contact email is [kvelter@manleydeas.com](mailto:kvelter@manleydeas.com)

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Objection of PNC Bank, National Association to the Confirmation of the Amended Plan was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Esq., Chapter 13 Trustee, Chapter 13 Trustee, P.O. Box 1229,  
Philadelphia, PA 19105, ecfemails@ph13trustee.com

Brad J. Sadek, Attorney for Ardena Y Starks, Sadek and Cooper, 1315 Walnut Street, Suite  
502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on December 7,  
2020:

Ardena Y Starks, 7300 Passyunk Avenue, Philadelphia, PA 19142

Pennsylvania Housing Finance Agency, Attn: Bankruptcy, Po Box 8029, Harrisburg, PA  
17105

DATE: December 7, 2020

/s/ Karina Velter

Karina Velter, Esquire (94781)  
Adam B. Hall (323867)  
Sarah E. Barngrover (323972)  
Manley Deas Kochalski LLC  
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The case attorney for this file is Karina  
Velter.  
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